

August 4, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Natural Flavors Inc, Elan Vanilla Co., and Flavorganics LLC support the continued allowance of the following substances:

Name of Substance	Location on National List (ie. 205.605(a))	Reason for continued allowance.	Supporting Documents (example: research data or other international organic programs)
Citric acid	205.605(a)	Used in organic flavors both for flavor profile and pH adjustment; not commercially available as organic	
Lactic acid	205.605(a)	Used in organic flavors both for flavor profile and pH adjustment; not commercially available as organic	

Colors	205.605(a)	Used in organic flavors and organic flavored syrups. None are commercially available in an organic form.	
Diatomaceous Earth	205.605(a)	Used as a processing aid in the manufacture of organic flavored syrups and for filtration of organic flavors. Not available in an organic form.	
Nitrogen	205.605(a)	Used as a quenching agent to avoid oxidation of organic essential oils.	
Tartaric Acid	205.605(a)	Used in organic flavors both for flavor profile and pH adjustment; not commercially available as organic	
Flavors	205.605(a)	Used by our customers. Not available as organic in sufficient variety to meet industry requirements and consumer demand.	
Carrageenan	205.605(a)	Used by our customers as a viscosity agent in various organic foods. Not commercially available in organic form.	

Dairy cultures	205.605(a)	Used by our customers in the production of organic yogurts and other organic fermented foods. Not commercially available in an organic form.	
Enzymes	205.605(a)	Used by our customers in organic fermented products. Not available in an organic form.	
Ascorbic Acid	205.605(b)	Used in organic flavors both for flavor profile and pH adjustment; not commercially available as organic	
Calcium Hydroxide	205.605(b)	Used by our sugar suppliers for ph adjustment.	
Glycerine	205.605(b)	Used in organic flavors as a carrier. (Note: Glycerine is widely available in a non-synthetic form and should be considered for re-classification in the future.)	
Silicon dioxide	205.605(b)	Used as a free-flow agent in organic powdered flavors. (Note: As a mineral, this should be considered for re-classification as non-synthetic in the future.)	

Sodium Citrate	205.605(b)	Used as a buffering agent in various organic processed foods. (Note: As a mineral, this should be considered for re-classification as non-synthetic in the future.)	
Xanthan gum	205.605(b)	Used by our customers as a viscosity agent in various organic foods. (Note: As a product of fermentation of carbohydrates, this should be considered for re-classification in the future.)	
Carbon Dioxide	205.605(b)	Used by our customers for organic beverages.	
Ethylene	205.605(b)	Used by our customers and suppliers for post-harvest ripening.	
Hydrogen peroxide	205.605(b)	Used by our customers in aseptic packaging of organic beverages and organic processed foods.	
Lecithin (bleached)	205.605(b)	Used as an emulsifier in organic processed foods.	
Lecithin (unbleached)	205.606	Used as an emulsifier in organic processed foods.	
Gums	205.606	Used as a thickening agent, stabilizer and viscosity agent in organic processed foods. (Note: Gum Arabic is widely available in organic	

		form.)	
Pectin (high-methoxy)	205.606	Used as a thickening agent in organic processed foods and beverages.	

Respectfully submitted,

Herbert Stein,
representing
Natural Flavors, Inc.

and

Julie Weisman,
representing
Flavorganics, LLC and Elan Vanilla Co.

Cc: Organic Trade Association
National Organic Standards Board

Attachment: "Evaluation Criteria for Substances Added to the National List"

Attached is the website that contains the "Evaluation Criteria for Substances Added to the National List". It is highly suggested that this evaluation be submitted with comments.

http://www.ams.usda.gov/nop/Newsroom/SunsetDocFedReg06_05.pdf